

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

KIERAN RAVI BHATTACHARYA,

Plaintiff,

v.

JAMES B. MURRAY, JR., et. al.,

Defendants.

Civil Action No.: 3:19-CV-00054

**PLAINTIFF’S RENEWED MOTION TO SEAL EXHIBIT A TO
PLAINTIFF’S RESPONSE TO MOTION TO QUASH FLEMING SUBPOENA**

Plaintiff Kieran Ravi Bhattacharya (“Mr. Bhattacharya”), by counsel, respectfully moves to seal Exhibit A to Plaintiff’s Response to Motion to Quash Fleming Subpoena (Dkt. #186). On September 20, 2021, the Court denied without prejudice Mr. Bhattacharya’s initial Motion to Seal (Dkt #187) on the grounds that the document at which the motion was directed had not been submitted to the Court (Dkt #195). That oversight, for which Plaintiff’s counsel apologizes to the Court, has since been corrected. Exhibit A was sent via email to the Court on September 30, 2021. Accordingly, Mr. Bhattacharya hereby moves to seal Exhibit A once again.

Exhibit A is a document produced by Defendants in discovery that consists of an email chain among University of Virginia administrative personnel, including Evelyn R. Fleming, members of the Threat Assessment Team, and the Associate Dean of Students. The email contains private information about Mr. Bhattacharya’s academic and medical history, sensitive information from Mr. Bhattacharya’s ex-girlfriend, Angel Hsu, and disciplinary measures explored by UVA. When produced to Mr. Bhattacharya, the email was designated by Defendants as highly confidential, pursuant to the Stipulated Protective Order entered in this matter. (Dkt #150).

Alternatives to sealing are not possible here given the nature of the Stipulated Protective Order, which by its terms limits access to highly confidential documents to attorneys, attorneys' clerical employees and support staff, experts, witnesses, court personnel, or others only upon two-party consent. *See* Stipulated Protective Order (Dkt #150) at 8-9. Sealing is requested indefinitely, due to the sensitive nature of the contents of Exhibit A and the requirements of the Stipulated Protective Order entered by this Court.

Date: September 30, 2021

Respectfully submitted,

KIERAN RAVI BHATTACHARYA

By: s/ Michael J. Lockerby
Counsel

Michael J. Lockerby (VSB No. 24003)
FOLEY & LARDNER LLP
Washington Harbour
3000 K Street, N.W., Suite 600
Washington, D.C. 20007-5109
Telephone: (202) 672-5300
Facsimile: (202) 672-5399
Email: mlockerby@foley.com

Counsel for Plaintiff, Kieran Ravi Bhattacharya